

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: William Edward Tabor and
Nancy Jane Tabor
Debtor(s)

Bankruptcy No. 18-23487-TPA
Chapter 13
Related to Document No. 99
Docket Document No. 102

RESPONSE TO LETTER FILED BY DEBTORS

AND NOW David A. Colecchia, Counsel for the Debtors, files this response to the Court Order at DD No. 99 and the Debtors' letter identified as Exhibit A attached thereto. In support of this Response, Debtors' Counsel reports the following.

- 1) The Debtors and Counsel discussed the matter of the purchase of a replacement car though Counsel does not recall the exact date of the discussions, Counsel estimates the discussions were over approximately the previous sixty to ninety days.
- 2) During these conversations, Counsel for the Debtors raised certain concerns about the replacement vehicle purchase and informed the Debtors of same.
- 3) Despite these concerns, Counsel did agree to prepare and present a motion for the purchase of a replacement vehicle to replace the damaged and repaired vehicle.
- 4) The Debtors and Counsel did not set a deadline for when the Motion was to be filed.
- 5) Counsel delayed filing the motion due to Counsel's concerns he discussed with the Debtors. Counsel cannot add detail as detail may potentially breach Client-Attorney confidentiality.

6) The Debtors and Counsel had additional discussions in late August, early September.

During these discussions, the Debtors provided additional information that addressed

Counsel's concerns in part, and Counsel filed the necessary Motion in early September.

WHEREFORE, Counsel for the Debtor so responds.

Dated: September 15, 2020

Respectfully requested,

/s/David A. Colecchia, Esquire

Law Care

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